

\*\*\*\*\*CONFIDENTIAL DEPOSITION\*\*\*\*\*

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Leighton Technologies, LLC, )

Plaintiff-Counterclaim )

Defendant, ) Case No.

-vs- )04Civ

Oberthur Card Systems, S.A.,)2496(CM)

Defendant-Counterclaim )

Plaintiff. )

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Deposition of KEITH R. LEIGHTON, a witness herein, called by the Defendant-Counterclaim Plaintiff, as if upon cross-examination under the statute, and taken before Luanne Stone, a Notary Public within and for the State of Ohio, pursuant to the issuance of notice and subpoena, and pursuant to the further stipulations of counsel herein contained, on Sunday, the 9th day of October, 2005 at 9:00 o'clock A.M., at the Renaissance Hotel, the City of Cleveland, the County of Cuyahoga and the State of Ohio.

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& Associates**

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1 A Correct.

2 Q Okay, and now I'm asking you: When is  
3 the first time you made a plastic laminated  
4 card in which the pressure during the  
5 cooling phase was at least ten percent  
6 greater than the pressure during the heating  
7 phase?

8 MR. GUTKIN: Vague and ambiguous.

9 BY MR. JACOBS:

10 Q You can answer the question.

11 A I'm not sure what you're trying to get  
12 at here.

13 Q Do you understand the question?

14 A When was the first time that I made a  
15 plastic card where I increased the pressure  
16 during the cooling cycle?

17 Q That's exactly right, by at least ten  
18 percent.

19 A I may have done that back in 1970. I'm  
20 not sure. I'm not sure. Like I say,  
21 different plastic, depending upon what is  
22 printed on the sheets, required different  
23 temperatures.

24 Q Sir, have you ever made a plastic  
25 laminated card where you increased the